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# FACSIMILE

DATE: **September 1, 2009**

JOB CODE:

*Please deliver this and the following pages to:*

Name: **Benjamin R. Bruckart**  
Company/Firm: **United States Patent and Trademark Office**  
Telecopier No.: **571-273-3982**  
Client/Matter No.: **\*\*BA-0330**  
Application No. **09/870,538**  
Sender's Name: **Jon M. Isaacson/Erika Eidsmoe**  
Pages to Follow: **15**

If transmission is not complete, please call our **Seattle Office** at **(206) 332-1380**.

## COVER MESSAGE:

Attached hereto are the following documents:

1. Applicant Initiated Interview Request Form – (1 page)
2. Draft Response to Non-Final Office Action dated: June 26, 2009 (14 pages)

Thank You and Please Call 206-332-1112 to schedule a time for the interview.

--Erika Eidsmoe

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERY OF THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

**Applicant Initiated Interview Request Form**

Application No.: 09/870,538 First Named Applicant: James K. Prueitt  
 Examiner: Benjamin R. Bruckart Art Unit: 2446 Status of Application: Pending

**Tentative Participants:**

(1) Benjamin R. Bruckart (2) Jon M. Isaacson (60,436)  
 (3) \_\_\_\_\_ (4) \_\_\_\_\_

Proposed Date of Interview: To be determined Proposed Time: To be Determined AM/PM

**Type of Interview Requested:**

(1) ☒ Telephonic (2) ☐ Personal (3) ☐ Video Conference

Exhibit To Be Shown or Demonstrated: ☐ YES ☐ NO

If yes, provide brief description: \_\_\_\_\_

**Issues To Be Discussed**

Issues (Rej., Obj., etc)	Claims/ Fig. #s	Prior Art	Discussed	Agreed	Not Agreed
(1) <u>Spec objection</u>	<u>see draft amend</u>	<u>-----</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(2) <u>101 rejection</u>	<u>claims 56-62</u>	<u>-----</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(3) <u>Prop. amend</u>	<u>Claims 40, 48, 56</u>	<u>-----</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(4) <u>103 rejection</u>	<u>Claims 40, 48, 56</u>	<u>Hinds</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

☐ Continuation Sheet Attached

**Brief Description of Argument to be Presented:**

See attached draft response. Applicants believe that proposed spec amendments overcome objection to the spec, and proposed amendments to claims 56-62 overcome 101 rejection. Further, applicants believe that proposed amendments to claims 40, 48, and 56 overcome the 103 rejection.

An interview was conducted on the above-identified application on \_\_\_\_\_.

NOTE: This form should be completed by applicant and submitted to the examiner in advance of the interview (see MPEP § 713.01).

This application will not be delayed from issue because of applicant's failure to submit a written record of this interview. Therefore, applicant is advised to file a statement of the substance of this interview (37 CFR 1.133(b)) as soon as possible.

/Jon M. Isaacson/  
Applicant/Applicant's Representative Signature  
Jon M. Isaacson  
Typed/Printed Name of Applicant or Representative  
60,436

\_\_\_\_\_  
 Examiner/SPE Signature

Registration Number, if applicable

This collection of information is required by 37 CFR 1.133. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11 and 1.14. This collection is estimated to take 21 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

If you need assistance in completing the form, call 1-800-PTO-9199 and select option 2.

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of:  
**James K. Prueitt, et al.**

Confirmation No.: **1320**

Application No.: **09/870,538**

Group Art Unit: **2446**

Filing Date: **May 30, 2001**

Examiner: **Benjamin R. Bruckart**

For: **METHOD AND SYSTEM GENERATING A PERMANENT RECORD OF A  
SERVICE PROVIDED TO A MOBILE DEVICE.**

Mail Stop Amendment  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

**REPLY PURSUANT TO 37 CFR § 1.111**

In response to the Official Action dated **June 26, 2009**, reconsideration is respectfully requested in view of the amendments and/or remarks as indicated below:

- ☒ **Amendments to the Specification** begin on page 2 of this paper.
- ☒ **Amendments to the Claims** are reflected in the listing of the claims which begins on page 5 of this paper.
- ☐ **Amendments to the Drawings** begin on page \_\_\_\_\_ of this paper and include an attached replacement sheet.
- ☒ **Remarks** begin on page 8 of this paper.
- ☐ **Request For Refund** submitted herewith.

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**Amendments to the Specification:**

Please amend the paragraph of the specification starting on page 2, line 22, and ending on page 3, line 6, as follows:

Some of these applications are already being offered. In Japan, the ALAN Corporation offers a service name Q-PHON in which a coupon with a bar-code is displayed on an I-mode phone and the consumer can use the coupon by presenting the phone. The bar-code serves as a means of validating the coupon. While this service is exciting, it also presents some of the shortcomings of the presently available services. As has been described, with over 100,000 registered subscribers, access to the service can be slow at times and patience is recommended. ("Barcoded E-Tickets and Coupons on i-mode", Mobile Media Japan, <http://www.mobilemediajapan.com/newsdesk/q-phon>, MobileMediaJapan website, May 7, 2001). This recommendation presents no consolation to a consumer attempting to enter the theater before the beginning of the first act. A hardcopy ticket which the consumer could obtain before the event would be desirable.

Please amend the paragraph of the specification starting on page 3, line 7, and ending on page 3, line 11, as follows:

A different approach to the providing of tickets via the Internet is used by ~~TicketMaster.com~~ TicketMaster online ticketing service. Using that service, the consumer can order a ticket for an event and have the ticket mailed or retrieve the ticket at the "will-call" window. The convenience of purchasing a ticket just before the event or of not having to wait in a queue if the ticket is purchased several days before the event is not provided.

Please amend the paragraph of the specification starting on page 14, line 17, and ending on page 15, line 22, as follows:

Referring to FIG. 3A, in one embodiment, the mobile device 10 is a WAP enabled device as shown in FIGS. 14A and 14B and the receiving server 17 is the service server 50. After selecting the WAP services mode as shown in FIG. 14B, the user can then select bookmarks or the micro browser. Referring to FIGS. 3A and 14B, when the user of the mobile device 10, the device 10 being in the Web access mode as shown in FIG. 14B, selects

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a bookmark, ~~MyTickets.com~~ MyTickets web site for example, from the user's bookmarks, a WAP request is transmitted by the device 10 through the network 20 and is converted by the WAP Gateway (not shown) to a Web request which is transmitted to the service server 70. The MyTickets web site (not shown) ~~MyTickets.com~~ resides at the service server 70. The service server 70 transmits back a response through the WAP Gateway and the network 20 to the micro browser in the device 10. Through a series of requests and responses, the user selects an event (step 100, FIG. 8). Through another series of requests and responses, at the service server 70, availability of tickets for the event is verified (which could involve accessing other servers which are not shown) and available seats are identified; the user selects a seating location and selects to purchase the tickets. The request to purchase the tickets results in a response informing the user that the user will view pages over a secure connection which will involve the transaction server 80. The user, then, through a series of requests and responses, provides billing information (transaction data) 120, either by entering by entering the data (credit card number and expiration date, billing address, etc.) or referring to data previously stored at the service server 70 or the transaction server 80, reviews the selection and completes the transaction (step 130, FIG. 8). This completes the processing of the order for the tickets (step 140, FIG. 8). At that point in the process, a message can be sent, from the service server 70, to the mobile device 10 confirming that the request for the ticket has been completed (step 145, FIG. 8). That message can contain information to ensure that, in the event that the permanent record is lost, the user can still obtain the service. The message could be electronic mail, an SMS service message, or any other form of electronic message. Also at this point in the method, the data for the service 165 is provided to the printing server 50 (step 140, FIG. 8). The ticket data 65 comprises an event name, an event date, seating information, a ticket price, security information, and an advertisement or logo. The transmission between the service server 70 and the printing server 50 occurs via the TCP/IP network 60.

Please amend the paragraph of the specification starting on page 16, line 18, and ending on page 175, line 6, as follows:

Referring to FIG. 5A, in one embodiment, the mobile device 10 is a WAP enabled device as shown in FIGS. 14A and 14B, the receiving server 17 is the service server 70 and

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the location data 185 (FIG. 9) is provided by a device based method, namely a GPS system 90. After selecting the WAP services mode as shown in FIG. 14B, the user can then select bookmarks or the micro browser. Referring to FIGS. 3A and 14B, when the user of the mobile device 10, the device 10 being in the Web access mode as shown in FIG. 14B, selects a bookmark, ~~MyCoupons.com~~ MyCoupons web site for example, from the user's bookmarks, a WAP request is transmitted by the device 10 through the network 20 and is converted by the WAP Gateway (not shown) to a Web request which is transmitted to the service server 70. The MyCoupons web site (not shown) ~~MyCoupons.com~~ resides at the service server 70. The service server 70 transmits back a response through the WAP Gateway and the network 20 to the micro browser in the device 10. Through a sequence of requests and responses, the user accesses the user's account at ~~MyCoupons.com~~ the MyCoupons web site. Referring to FIG. 9, through the sequence of requests and responses, a request for coupons is received at the service server 70 (step 205).

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This listing of claims will replace all prior versions, and listings, of claims in the application.

**Listing of Claims:**

1. – 39. (Canceled)

40. (Currently amended) A method of generating a permanent record of a service provided to a user at a location of a mobile device of the user, the method comprising:

receiving a request for a permanent record of a service and information identifying a specific printer on which the permanent record is to be printed, wherein the specific printer is located at the location of the mobile device of the user, and wherein the request for the permanent record and the information identifying a specific printer are received from the mobile device of the user;

processing the received request for the permanent record, wherein the processing includes generating data for printout of the permanent record, the data for printout comprising a digital image, the digital image comprising a plurality of pixels; and

transmitting the generated data to a print server, wherein the print server is configured to modify the data for the printout based on the characteristics of the specific printer and transmit the modified data for the printout to the mobile device of the user, wherein the modification of the data comprises utilizing an adaptive halftone method;

wherein the mobile device is configured to communicate the modified data for the printout of the permanent record to the specific printer;

wherein the adaptive halftone method comprises performing the following for each pixel in the plurality of pixels:

determining an input value of the pixel;

determining a filtered value of the pixel based on a filter of the digital image;

obtaining a difference value of the pixel, the difference value being the difference between the input value and the filtered value; and

generating the output value for the pixel based on a relationship of the difference value to a threshold value, the threshold value based on a difference value and a filtered value of another pixel from the plurality of pixels.

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41. (Previously Presented) The method of claim 40, further comprising:  
completing a transaction with a transaction server prior to transmitting the generated data to a print server.
42. (Previously Presented) The method of claim 40, further comprising:  
receiving data relating to the location of the mobile device, wherein the location of the mobile device is determined by the mobile device.
43. (Previously Presented) The method of claim 40, further comprising:  
transmitting a message to the mobile device after transmitting the generated data to a print server, wherein the message comprises a confirmation that the request for the permanent record has been filled.
44. (Previously Presented) The method of claim 40, wherein the requested service is an event ticket.
45. (Previously Presented) The method of claim 40, wherein the requested service is a coupon.
46. (Previously Presented) The method of claim 42, wherein the requested service is a location-based service.
47. (Canceled)
48. (Currently amended) A system for generating a permanent record of a service provided to a user at a location of a mobile device of the user, the system comprising:  
a receiver configured to receive a request for a permanent record of a service and information identifying a specific printer on which the permanent record is to be printed, wherein the specific printer is located at the location of the mobile device of the user, and wherein the request for the permanent record and the information identifying a specific printer are received from the mobile device of the user;

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a processor configured to process the received request for the permanent record, wherein the processing includes generating data for printout of the permanent record, the data for printout comprising a digital image, the digital image comprising a plurality of pixels; and

a transmitter configured to transmit the generated data to a print server, wherein the print server is configured to modify the data for the printout based on the characteristics of the specific printer and transmit the modified data for the printout to the mobile device of the user, wherein the modification of the data comprises utilizing an adaptive halftone method;

wherein the mobile device is configured to communicate the modified data for the printout of the permanent record to the specific printer;

wherein the adaptive halftone method comprises performing the following for each pixel in the plurality of pixels:

determining an input value of the pixel;

determining a filtered value of the pixel based on a filter of the digital image;

obtaining a difference value of the pixel, the difference value being the difference between the input value and the filtered value; and

generating the output value for the pixel based on a relationship of the difference value to a threshold value, the threshold value based on a difference value and a filtered value of another pixel from the plurality of pixels.

49. (Previously Presented) The system of claim 48, further comprising:

a communication mechanism configured to communicate with a transaction server prior to transmitting the generated data to a print server.

50. (Previously Presented) The system of claim 48, wherein the receiver is further configured to receive data relating to the location of the mobile device, wherein the location of the mobile device is determined by the mobile device.

51. (Previously Presented) The system of claim 48, further comprising:

a transmitter configured to transmit a message to the mobile device of the user after transmitting the generated data to a print server, wherein the message comprises a confirmation that the request for the permanent record has been filled.

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52. (Previously Presented) The system of claim 48, wherein the requested service is an event ticket.

53. (Previously Presented) The system of claim 48, wherein the requested service is a coupon.

54. (Previously Presented) The system of claim 50, wherein the requested service is a location-based service.

55. (Canceled)

56. (Currently amended) A tangible computer readable medium comprising instructions for generating a permanent record of a service provided to a user at a location of a mobile device of the user, the instructions comprising instructions for:

receiving a request for a permanent record of a service and information identifying a specific printer on which the permanent record is to be printed, wherein the specific printer is located at the location of the mobile device of the user, and wherein the request for the permanent record and the information identifying a specific printer are transmitted from the mobile device of the user;

processing the received request for the permanent record, wherein the processing includes generating data for printout of the permanent record, the data for printout comprising a digital image, the digital image comprising a plurality of pixels; and

transmitting the generated data to a print server, wherein the print server is configured to modify the data for the printout based on the characteristics of the specific printer and transmit the modified data for the printout to the mobile device of the user, wherein the modification of the data comprises utilizing an adaptive halftone method;

wherein the mobile device is configured to communicate the modified data for the printout of the permanent record to the specific printer;

wherein the adaptive halftone method comprises performing the following for each pixel in the plurality of pixels:

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determining an input value of the pixel;  
determining a filtered value of the pixel based on a filter of the digital image;  
obtaining a difference value of the pixel, the difference value being the  
difference between the input value and the filtered value; and  
generating the output value for the pixel based on a relationship of the  
difference value to a threshold value, the threshold value based on a difference value  
and a filtered value of another pixel from the plurality of pixels;

57. (Currently amended) The tangible computer readable medium of claim 56, the instructions further comprising instructions for:

completing a transaction with a transaction server prior to transmitting the generated data to a print server.

58. (Currently amended) The tangible computer readable medium of claim 56, the instructions further comprising instructions for:

receiving data relating to the location of the mobile device, wherein the location of the mobile device is determined by the mobile device.

59. (Currently amended) The tangible computer readable medium of claim 56, the instructions further comprising instructions for:

transmitting a message to the mobile device of the user after transmitting the generated data to a print server, wherein the message comprises a confirmation that the request for the permanent record has been filled.

60. (Currently amended) The tangible computer readable medium of claim 56, wherein the requested service is an event ticket.

61. (Currently amended) The tangible computer readable medium of claim 56, wherein the requested service is a coupon.

62. (Canceled)

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## REMARKS

### Office action summary

As of the mailing of the office action of June 26, 2009 ("Office Action"), claims 40-62 were pending in the present application. Claims 40, 48, and 56-61 are presently amended. Claims 47, 55, and 62 are presently canceled. No claims are presently added. Thus, following entry of the present amendments, claims 40-46, 48-54, and 56-61 will be pending. Entry of the present amendment and further examination of the present application in view of the following remarks are hereby requested.

The following objection and rejections were made in the Office Action:

- The specification was objected to because it contained embedded hyperlinks and/or browser-executable code.
- Claims 56-62 were rejected under 35 USC § 101 as being directed to non-statutory subject matter.
- Claims 40-41, 43-45, 47-49, 51-53, 55-57, and 59-62 were rejected under 35 USC § 103(a) as being unpatentable over Klear et al, WO 01/03040 ("Klear"), in view of Devarics, US Patent 6,553,240 ("Devarics"), and further in view of Hinds et al, US Patent 7,092,119 ("Hinds").
- Claims 42, 46, 50, 54, and 58 were rejected under 35 USC § 103(a) as being unpatentable over Klear, in view of Devarics and Hinds, and further in view of Fidler, US Patent 6,725,051 ("Fidler").

The amendments, objection, and rejections are discussed below. The examiner is respectfully urged to reconsider the application and withdraw the objection and the rejections. Should the examiner have any questions or concerns that might be efficiently resolved by way of a telephonic interview, the examiner is invited to call applicants' undersigned attorney, Jon M. Isaacson, at 206-332-1102.

### Objection to the specification

The specification stands objected to because it contained embedded hyperlinks and/or browser-executable code. Applicants note the requirement in MPEP § 608.01(VII) that the specification may not contain any text which may cause the PTO's website to display the text

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as an active link. Applicants presently amend the specification in those locations where the examiner identified the text as browser-executable code. Accordingly, applicants respectfully request withdrawal of the objection to the specification.

Claim amendments

Without conceding the propriety of the rejections made in the Office Action, applicants presently amend claims 40, 48, and 56-61. No new matter is added. The present amendment include generally two different grounds of amendments. First, claims 56-61 are presently amended to recite a “*tangible* computer readable medium.” (Emphasis added) Second, claims 40, 48, and 56 are presently amended to incorporate subject matter similar to the subject matter recited by claims 47, 55, and 62, respectively. However, in an attempt to clarify the subject matter previously recited by claims 47, 55, and 62, the present amendments to claims 40, 48, and 56 differ somewhat from the subject matter previously recited by claims 47, 55, and 62. The patentability of the claims, in light of the present amendments, is discussed below.

Rejections under 35 USC § 101

Claims 56-62 were rejected under 35 USC § 101 as being directed to non-statutory subject matter. Specifically, the examiner interprets the term “computer readable medium” broadly, in accordance with paragraph 0076 of applicants’ specification, to include non-statutory subject matter such as carrier waves and signals. (Office Action, page 3.) Applicants presently amend claims 56-61 such that they recite a “*tangible* computer readable medium.” (Emphasis added.) Applicants respectfully submit that a tangible computer readable medium cannot be reasonably interpreted as encompassing carrier waves or signals. Therefore, applicants submit that claims 56-61 are directed to statutory subject matter, and applicants respectfully request withdrawal of the rejection of claims 56-61 under 35 USC § 101.

Rejections under 35 USC § 103(a)

**Claim 40** stands rejected under 35 USC § 103(a) as being unpatentable over Klear in view of Devarics, and further in view of Hinds. Insofar as this ground of rejection pertains to

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claim 40 as amended, applicants traverse same and hereby request reconsideration thereof. As presently amended, claim 40 recites transmitting data for printout to a print server where the data comprises a digital image and where the print server is configured to modify the data based on characteristics of the specific printer by utilizing an adaptive halftone method. Claim 40 further recites that:

the adaptive halftone method comprises performing the following for each pixel in the plurality of pixels:

- determining an input value of the pixel;
- determining a filtered value of the pixel based on a filter of the digital image;
- obtaining a difference between the input value and the filtered value, the difference represented by a difference value;
- generating the output value for the pixel based on a relationship of the difference value to a threshold value, the threshold value based on a difference value and a filtered value of another pixel from the plurality of pixels.

In the Office Action, the examiner recognizes that the neither Klear in view of Devarics fails to teach or suggest receiving information about the specific printer or that a print server modifies data based on characteristics of the specific printer by utilizing an adaptive halftone method. (Office Action, page 4.) The examiner then cites, as teaching the adaptive halftone method previously recited by claim 47, to the following portion of Hinds:

Many images are stored as variants of red, green, and blue, i.e., RGB system. However, printers use the colors cyan, magenta, yellow, and black to print, i.e. CMYK. When printing an image in an RGB format, such as an image displayed on the monitor, the RGB image is first transformed to a device dependent CMYK color space that corresponds to the RGB space. However, different printers produce varying output given the same CMYK input color space. The ability of a printer to reproduce an input image may be affected by many printing variables, such as the model of the printer, the age of the printer, the paper, toner, and environmental variables, such as temperature and pressure. All these variables affect how a printer produces an image from the CMYK input color space.

To account for variables, a printer is calibrated. Calibration occurs by having the subject printer print patches of colors having known color values. A device referred to as a densitometer then measures the printed color values. The printed color values are then compared to the actual value of the colors maintained for the patches. Mathematical

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interpolation is used to generate a calibration curve which relates the actual printer measured output to the input patch of colors. This calibration curve provides a mapping from input color values, in a device independent CMYK space, to printer CMYK values that will produce the desired colors. Thus, the calibration curve maps the target or colors of the actual gray scale image to the printer, device dependent, CMYK color space. After the calibration curve is applied to adjust the input color or grayscale values, a halftone and dithering algorithms are applied to convert the calibrated gray scale image into a bi-level matrix where each pixel has only one of two values, or for a contone printer one of only a few values.

(Hinds, col. 1 line 41 – col. 2 line 6.) The first paragraph of this portion of Hinds discusses transforming RGB image values into CMYK image values, and recognizes that physical and environmental print variables can affect the actual color of a printout. The second paragraph of this portion of Hinds discusses scanning a printout to determine a difference between the printout color and the CMYK image values to define a calibration curve for mapping input CMYK image values to the actual color that is outputting by the specific printer.

In contrast to the teachings of Hinds to compare CMYK image values to actual printouts, claim 40 recites obtaining a difference value for each pixel, where the difference value is the difference between the input value of the pixel and a filtered value of the pixel. Furthermore, claim 40 recites that the output value of the pixel is based on a relationship of the difference value to a threshold value, where the threshold value is based on a filtered value and a difference value of another pixel from the plurality of pixels. Applicants can discern no teaching or suggestion in Hinds of a threshold value that is based on any value of another pixel.

Applicants can discern no teaching or suggestion in Klear or Devarics which overcomes the deficiencies of Hinds described above. Therefore, applicants respectfully submit that claim 40 is patentably defined over the cited art. Accordingly, applicants request withdrawal of the rejection of claim 40 under 35 USC § 103(a).

Independent claims 48 and 56 are presently amended such that they contain recitations similar to those recitations of claim 40 discussed above. For at least the reasons discussed above regarding the patentability of claim 40, applicants submit that claims 48 and 56 are patentably defined over the cited art. Accordingly, applicants respectfully request withdrawal of the rejection of claims 48 and 56 under 35 USC § 103(a).

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Claims 41-46, 49-54, and 57-61 depend, directly or indirectly, from claims 40, 48, and 56, respectively. Inasmuch as claims 41-46, 49-54, and 57-61 depend from independent claims which are patentably defined over the cited art, applicants submit that claims 41-46, 49-54, and 57-61 are patentably defined over the cited art for the reasons articulated above. Accordingly, applicants respectfully request withdrawal of the rejection of claims 41-46, 49-54, and 57-61 under 35 USC § 103(a).

**Conclusion**

Applicants believe that the present remarks are responsive to each of the points raised by the examiner in the Office Action, and submit that claims 40-46, 48-54, and 56-61 of the application are in condition for allowance. Favorable consideration and passage to issue of the application at the examiner's earliest convenience is earnestly solicited.

Date: DRAFT

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